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ARIZONA CORPORATION COMMISSION  
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December 23, 2009

Comissioner Bob Stump  
1200 W. Washington, 2nd Floor  
Phoenix, AZ 85007

**Re: Talton Communications, Inc.**

Dear Comissioner Stump:

It has come to our attention that a company named Talton Communications, Inc. ("Talton"), may be providing inmate telephone services in the State of Arizona without the proper regulatory authorities. To be specific, we understand that Talton is providing detainee telephone services at the following Immigration and Customs Enforcement facility without first complying with applicable laws and regulations that would enable it to provide these services legally.

1. Florence Service Processing Center - Florence, Arizona (11/20/09)

It is self-evident that allowing any inmate telephone service provider such as Talton to operate without proper legal authority in the State of Arizona first, is grossly unfair to other industry participants who do bear the time and expense of complying with applicable laws and regulations; second, threatens regulatory chaos in the marketplace; and, most fundamentally, harms the public because laws and regulations are in place to protect them from high rates and a lack of transparency.

We respectfully urge you investigate this matter and to take immediate action to uphold and ensure all inmate telephone services are provided by Talton in compliance with applicable state laws and regulations and, just as important, ensure that detainees and their loved ones are not being overcharged for their telephone calls.

If you do determine that they are properly certified, please forward the documentation to us. In the mean time, please do not hesitate to contact me with any questions or concerns.

Sincerely,

Paul Jennings  
CEO

Arizona Corporation Commission

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